

Notice of Proposed Rulemaking (NPRM)
Docket No. FAA-2008-0188
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Comments from Omniflight Helicopters

For clarification -- NPRM items are in bold italic

- *While aircraft registration information is still used to support the delivery of airworthiness directives and other traditional safety-related uses, the information is increasingly relied upon for newer programs, such as flight plan verification.*

OHI Response:

Are aircraft registration records crossed checked with OST Form 6410? All commercial operators are required to submit OST Form 6410 when they add or remove aircraft from their fleet. Many of those aircraft are leased from financial institutions. Safety related information could and should be sent to the aircraft operator and the aircraft owner. Aircraft leases give full operational control of the aircraft to the lessee/operator; therefore the aircraft flight plan information should be traceable back to the aircraft operator.

Operators must ensure all aircraft that they operate meets the registration requirements. If an owner fails to reregister an aircraft what will be the operator's recourse? Will the operator have the opportunity to register the aircraft on behalf of the owner?

- *Of the more than 343,000 aircraft registered, an estimated 104,000 or about one-third, are possibly no longer eligible for registration.*

OHI Response:

Assuming that the estimated number of aircraft is correct, how does the Agency expect to handle the workload? We believe the Agency will be asked to process 220 – 475 renewals daily based on a 3 year registration requirement.

- *The FAA recommends applications be made at least 45 days before the end of the 3-month period.*

OHI Response:

How does the Agency expect to perform that well? Today the Agency may take up to 120 days to renew our Director of Operations Certified Flight Instructor Certificate, which he has held for 38 years, renewing it every 2 years as required. With his history in the Agency's files we would expect the processing time to be much shorter. We are not convinced the Agency will be able to perform at this level.

- *...would establish 12 months as the maximum time that the pink copy of the Application, including any subsequently issued extensions, may be used as temporary authority to operate the aircraft after ownership has transferred,...*

OHI Response:

We believe this is adequate and reasonable.

- *Current FAA funding does not align with FAA's costs to provide services, and the current aircraft registration fee, which has been \$5.00 since the mid-1960's is an example of this disconnect.*

OHI Response:

We find no language outlining aircraft registration fees or an aircraft fee schedule. One can estimate the fee per aircraft could rise to \$45.00 based on H.R. 2881. The Aircraft Owners and Pilot Association (AOPA) estimates the fee could go as high as \$130 per aircraft every three years. Could the registration fee be tied to the aircraft certificated gross weight and/or type certification, (normal, experimental, etc.) or operation (personal, commercial, etc.)? We believe the fee structure should be finalized and open to public comment before moving forward.